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California Regional Water Quality Control Board

San Francisco Bay Region

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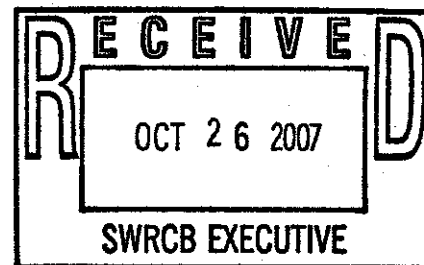
Arnold Schwarzenegger
Governor

12/4/07 Bd. Mtg.
Water Recycling Policy
Deadline: 10/26/07 Noon

TO: Jeanine Townsend (via email: commentletters@waterboards.ca.gov)
Acting Clerk to the Board
Executive Office
State Water Resources Control Board

Digitally signed by Bruce
Wolfe
Date: 2007.10.26 11:55:04
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FROM: Bruce H. Wolfe
Executive Officer
**SAN FRANCISCO BAY
REGIONAL WATER QUALITY CONTROL BOARD**



DATE: October 26, 2007

SUBJECT: COMMENTS ON STATE WATER BOARD'S REVISED DRAFT WATER
RECYCLING POLICY

Background:

On March, 20 and October 2, 2007, the State Water Board held public workshops to take public comment on a draft statewide water recycling policy. While this Regional Water Board did not comment at those workshops, we offer the following comments on the draft policy:

Comments:

1. Recently chaptered AB 1481 requires the State Water Board to adopt a general permit for irrigation uses of recycled water. The policy should be revised as appropriate to address the requirements of AB 1481.
2. The policy covers several interrelated issues: salt management, nutrient management, recycled water irrigation projects, and groundwater recharge reuse projects. While we prefer one policy on water recycling, the policy should contain issue sub-headings to clearly distinguish fundamentally different types of water recycling and the policies that apply to each. The policy should also plainly state that Aquifer Storage and Recovery projects are not addressed by this policy.
3. The policy at Resolved 8 allows groundwater monitoring for a limited scope of adverse impacts. The policy should allow for consideration of potential adverse impacts to all beneficial uses. Much of the policy focuses on salt management for irrigation projects, yet it is unclear how can salt loading be determined without groundwater monitoring.

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Groundwater monitoring requires flexibility, and the policy should not limit groundwater monitoring options.

4. The policy at Resolved 11 sets four requirements for establishing an effluent limitation for constituents without an MCL. The policy should clearly define the terms of the requirements to prevent any inappropriate restrictions on a Regional Water Board's ability to set effluent limits, such as the term, "approved analytical methods".
5. Emerging contaminants are not adequately addressed in the recycled water policy. The policy should clearly identify this water quality concern and specify a process to monitor, assess, and manage the potential risks associated with emerging contaminants.

We appreciate the opportunity to comment on the draft policy. Should you have any questions, please contact Michael Rochette at 510-622-2411 or MRochette at waterboards.ca.gov.